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HONGHUI CHEN

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 CHINA CENTRAL TELEVISION, a
11 China company, *et al.*

12 Plaintiffs,

13 v.

14 CREATE NEW TECHNOLOGY, (HK)
15 LIMITED, A Hong Kong Company, *et*
al.,

16 Defendants.

Case No. 2:15-cv-01869-SVW

DECLARATION OF
HONGHUI CHEN

Hon. Stephen V. Wilson

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19 **DECLARATION OF HONGHUI CHEN**

20 1. I, HONGHUI CHEN, make this declaration in my individual capacity as a named
21 defendant (collectively as “DECLARANT”). I make this declaration for the purpose of reporting our
22 compliance with the Consent Judgment and Permanent Injunction as to HONGHUI CHEN (“Order”)
23 entered by this Court on February 10, 2016.
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25 2. DECLARANT was previously engaged in the business of selling a device known as
26 “TVpad” via the Internet.

27 3. DECLARANT has not sold any TVpad device since April 1, 2015, and has no plan to
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1 sell any TVpad device in the future.

2 4. DECLARANT has provided plaintiffs' counsel with information required under
3 Paragraph 34 of the Order regarding all domain names owned, leased or operated by DECLARANT
4 that are used in connection with the activities enjoined under Paragraphs 30 and 31 of the Order.
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6 5. DECLARANT has not engaged in any of the activities enjoined under Order since its
7 issuance and has no plan to conduct any of the activities in the future.

8 I declare under penalty of perjury that the foregoing is true and correct, and that the
9 declaration is executed on February 16, 2016 in Alhambra, CA.
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15 HONGHUI CHEN
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PROOF OF SERVICE

The undersigned certifies that the foregoing document, DECLARATION OF HONGHUI CHEN, was filed electronically in compliance with Local Rule 5 – 3.3 and Federal Rules of Civil Procedure. As such, this document was served on all counsel deemed to have consented to electronic service. Local Rule 5 – 4.1.3. All other counsel of record or per se parties not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. Mail, as identified below:

NONE.

On this 17th day of February, 2016.

/s/Jen-Feng Lee
Jen-Feng Lee